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6 IN THE UNITED STATES DISTRICT COURT

7 EASTERN DISTRICT OF CALIFORNIA

8 UNITED STATES OF AMERICA,

CASE NO. 1:24-CR-00209-KES-BAM

9 Plaintiff,

10 STIPULATION TO CONTINUE STATUS
CONFERENCE; AND ORDER

11 v.

12 JAMAR JONES et al,

13 Defendants.

14 IT IS HEREBY STIPULATED between the parties that the status conference set for August 27, 2025
15 at 1:00 pm before the Honorable Barbara A. McAuliffe be continued to October 22, 2025 at 1:00 p.m.

17 **STIPULATION**

18 Plaintiff United States of America, by and through its counsel of record, and defendants, by and
19 through defendants' counsel of record, hereby stipulate as follows:

20 1. The parties need additional time to further investigate/explore matters related to resolving
21 the case or setting a trial date.

22 2. The government has extended plea offers to defendants RUDD and JONES, which expire
23 October 1, 2025.

24 3. The government and defendant FERREIRA have been in plea negotiations. As part of
25 those negotiations, defendant FERREIRA's counsel sent an additional discovery request to the
26 government on August 7, 2025, which the government is seeking to fulfill expeditiously.

27 4. The parties are desirous of additional time to consider plea offers and/or finalize plea

1 negotiations.

2 5. By this stipulation, the parties now move to continue the status conference, and to
3 exclude time from August 27, 2025 to October 22, 2025.

4 6. The parties agree and stipulate, and request that the Court find the following:

5 a) The government has represented that the initial discovery associated with this
6 case includes investigative reports, and related documents, photographs, etc., in electronic form.
7 All of this discovery has been either produced directly to counsel and/or made available for
8 inspection and copying. Defense would like additional time to review discovery, and investigate
9 the foundation for a resolution by plea or trial further.

10 b) The government does not object to the continuance.

11 c) An ends-of-justice delay is particularly apt in this case because:

- 12 • Defendant needs additional time to review discovery, and conduct additional
13 investigation; and
- 14 • The parties need additional time to investigate/explore matters related to
15 proceeding via plea or trial.

17 d) Based on the above-stated findings, the ends of justice served by continuing the
18 case as requested outweigh the interest of the public and the defendant in a trial within the
19 original date prescribed by the Speedy Trial Act.

20 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
21 et seq., within which trial must commence, the time period of August 27, 2025 to October 22,
2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv)
22 because it results from a continuance granted by the Court at defendants' request on the basis of
23 the Court's finding that the ends of justice served by taking such action outweigh the best interest
24 of the public and the defendants in a speedy trial.

7. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Dated: August 18, 2025

Respectfully submitted,

ERIC GRANT
United States Attorney

By /s/ Robert L. Veneman-Hughes
ROBERT L. VENEMAN-HUGHES
Assistant United States Attorney

Dated: August 18, 2025

/s/ Eric Kersten
ERIC KERSTEN
Attorney for Defendant Jamar JONES

Dated: August 18, 2025

/s/ Anthony Capozi
ANTHONY CAPOZZI
Attorney for Defendant Stephanie FERREIRA

Dated: August 18, 2025

/s/ Steven Crawford
STEVEN CRAWFORD
Attorney for Defendant Jermen RUDD

ORDER

IT IS SO ORDERED that the status conference is continued from August 27, 2025, to **October 22, 2025 at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv). If the parties do not resolve the case in advance of the next status conference, they shall be prepared to set a trial date at the status conference hearing.

IT IS SO ORDERED.

Dated: August 19, 2025

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE